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10 Attorneys for Respondent
WELLS FARGO BANK, N.A.
11 (erroneously sued as Wells Fargo Bank)

12 **UNITED STATES DISTRICT COURT**

13 **CENTRAL DISTRICT OF CALIFORNIA — WESTERN DIVISION**

14 RALPH A. RONDA & GLADYS M.
RONDA,
15 Petitioners,

16 v.
17

18 WELLS FARGO BANK,
19 Respondent.

Case No. 2:15-cv-00948 PSG (JEMx)
Hon. Philip S. Gutierrez
Ctrm. 880 – Roybal

20 **REQUEST FOR JUDICIAL
NOTICE IN SUPPORT OF
RESPONDENT WELLS FARGO
BANK, N.A.'S MOTION TO
DISMISS PETITIONERS'
VERIFIED PETITION FOR
TEMPORARY INJUNCTION AND
OPPOSITION TO PETITION FOR
TEMPORARY INJUNCTION**

21 [Filed concurrently with Motion to Dismiss
22 Petition, Opposition to Petition, and
(Proposed) Order]

23 Date: April 13, 2015
24 Time: 1:30 pm
Ctrm.: 880 - Roybal

25 Action Filed: February 10, 2015
26 Trial Date: None Set

1 Pursuant to Federal Rule of Evidence Rule 201(b)(2) and (d), Respondent
2 WELLS FARGO BANK, N.A. (erroneously sued as Wells Fargo Bank) respectfully
3 requests that the Court take judicial notice of the following documents in support
4 of its Motion to Dismiss Petitioners' Verified Petition for Temporary Injunction
5 pursuant to Federal Rule of Civil Procedure 12(b)(6), and in support of
6 Respondent's Opposition to Petitioners' Petition for Temporary Injunction.

7 1. Deed of Trust dated September 24, 2008, and recorded in the Official
8 Records of the Los Angeles County Recorder's Office on August 26, 2008, as
9 Instrument Number 20081733114. A true and correct copy of the Deed of Trust is
10 attached hereto as Exhibit 1.

11 2. Notice of Default and Election to Sell Under Deed of Trust dated
12 April 23, 2012, and recorded in the Official Records of the Los Angeles County
13 Recorder's Office on April 25, 2012, as Instrument Number 20120611269. A true
14 and correct copy of the Notice of Default and Election to Sell Under Deed of Trust
15 is attached hereto as Exhibit 2.

16 3. Bankruptcy Court Docket as of February 19, 2015, in the United States
17 Bankruptcy Court, Central District of California Case Number 2:12-bk-48681-RN,
18 entitled *In re: Gladys D. Ronda*. A true and correct copy of the Bankruptcy Court
19 Docket is attached hereto as Exhibit 3.

20 4. Voluntary Chapter 7 Petition and Schedules filed November 20, 2012,
21 in the United States Bankruptcy Court, Central District of California Case Number
22 2:12-bk-48681-RN, entitled *In re: Gladys D. Ronda*. A true and correct copy of the
23 Voluntary Chapter 7 Petition and Schedules is attached hereto as Exhibit 4.

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1 5. Discharge of Debtor filed February 25, 2013, in the United States
2 Bankruptcy Court, Central District of California Case Number 2:12-bk-48681-RN,
3 Entitled, *In re: Gladys D. Ronda*. A true and correct copy of the Discharge of
4 Debtor is attached hereto as Exhibit 5.

6 | DATED: March 4, 2015

SEVERSON & WERSON
A Professional Corporation

By: /s/ *Jeremy T. Katz*

SUZANNE M. HANKINS
JARLATH M. CURRAN, II
JEREMY T. KATZ
Attorneys for Defendant
WELLS FARGO BANK, N.A.

PROOF OF SERVICE

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Orange, State of California. My business address is The Atrium, 19100 Von Karman Avenue, Suite 700, Irvine, CA 92612.

4 On March 4, 2015, I served true copies of the following document(s):

**REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF RESPONDENT
WELLS FARGO BANK, N.A.'S MOTION TO DISMISS PETITIONERS'
VERIFIED PETITION FOR TEMPORARY INJUNCTION AND
OPPOSITION TO PETITION FOR TEMPORARY INJUNCTION**

on the interested parties in this action as follows:

8 Ralph A. Ronda Plaintiffs, In Pro Per
9 Gladys M. Ronda Telephone: (626) 83
10 618 N. Glendora Ave., #3
Covina, CA 91724 res212c1@msn.com

Plaintiffs, In Pro Per

Telephone: (626) 859-3058
res212c1@msn.com

11 **BY MAIL:** I enclosed the document(s) in a sealed envelope or package
12 addressed to the persons at the addresses listed in the Service List and placed the
13 envelope for collection and mailing, following our ordinary business practices. I am
14 readily familiar with Severson & Werson's practice for collecting and processing
correspondence for mailing. On the same day that the correspondence is placed for
collection and mailing, it is deposited in the ordinary course of business with the
United States Postal Service, in a sealed envelope with postage fully prepaid.

15 I declare under penalty of perjury under the laws of the United States of
16 America that the foregoing is true and correct. I declare that I am employed in the
office of a member of the bar of this Court at whose direction the service was made.

Executed on March 4, 2015, at Irvine, California.



Sabrina Gridley